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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GOPI VEDACHALAM and KANGANA
BERI, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

TATA AMERICA INTERNATIONAL
CORPORATION, a New York
Corporation; TATA CONSULTANCY
SERVICES, LTD, an Indian Corporation;
and TATA SONS, LTD, an Indian
Corporation,

Defendants.

CASE NO. C 06-0963 (CW)

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER TO SHORTEN TIME FOR
HEARING ON PLAINTIFFS' UNOPPOSED
MOTION FOR PRELIMINARY
SETTLEMENT APPROVAL**

STIPULATION

Plaintiffs Gopi Vedachalam and Kangana Beri (“Plaintiffs”), on behalf of themselves and the Plaintiff National and California Classes, and Defendants Tata Consultancy Services, Ltd., and Tata Sons, Ltd. (together, “Defendants”) hereby stipulate and agree as follows:

WHEREAS, on February 21, 2013, Plaintiffs filed an unopposed Motion for Preliminary Approval of Class Action Settlement (the “Unopposed Motion”);

WHEREAS, on February 22, 2013, Plaintiffs filed an Amended Notice of Motion setting the hearing date for this this Unopposed Motion for April 4, 2013 at 2:00 p.m.;

WHEREAS, the parties agree to shorten the time for hearing this Unopposed Motion;

WHEREAS, the Court’s calendar shows that the Court is unavailable for a hearing on Thursday, February 28, 2013;

WHEREAS, Defendants’ counsel is unavailable during the Court’s regular hearing calendar on March 7, March 14, and March 21, 2013, as a result of various pre-scheduled professional commitments, including a trip out of the country for a twelve-day period and a scheduled Fourth Circuit Court of Appeals Oral Argument on March 21, 2013 in Richmond Virginia;

WHEREAS, the parties respectfully request that this Court set a hearing on this Unopposed Motion for Thursday, March 28, 2013, at 2:00 p.m., or as soon as the Court may hear the matter;

WHEREAS, the parties are also willing to submit this matter for consideration on the papers and waive hearing and respectfully request, in the alternative, that the Court decide Plaintiffs’ Unopposed Motion on the papers if the Court, after consideration of the proposed Settlement, adopts the Settlement as presented without any changes;

IT IS HEREBY STIPULATED AND RESPECTFULLY REQUESTED that this Court set a hearing on Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement for Thursday, March 28, 2013, at 2:00 p.m., or, in the alternative, preliminarily approve the Settlement on the papers.

1
2 Dated: February 22, 2012

Respectfully submitted,

3 LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP

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18 *Counsel for Plaintiffs and the National and California*
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20 Dated: February 22, 2013

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1 Dated: February 22, 2013

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ORDER

In light of the parties' stipulation regarding their desire to shorten time to set a hearing on Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, the Court will set a hearing on the motion for Thursday, March 28, 2013, at 2:00 p.m.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: February 25, 2013

By: 
HON. CLAUDIA WILKEN

Chief Judge, United States District Court